

EXHIBIT 2

From: [Marden, Libby](#)
To: [Beth Wilkins](#)
Cc: [Caritis, Alexandra](#); [Roopal Luhana](#); [Sarah London](#); [Holly Dolejsi](#); [Ellyn Hurd](#); [Andrew Kaufman](#); [Uber PW Bellwether](#); [Steven Rotman](#); [Rachel Abrams](#); [Uber MDL Discovery Team](#); [Sara Craig](#); [Wyatt, Geoffrey M.](#); [Bueno, Kim](#); [Levy, Jennifer](#); [Blake, Tara](#); [#Uber KE – Paralegal Team](#)
Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller
Date: Tuesday, December 30, 2025 7:17:10 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)

Hi Beth,

We will have two rebuttal reports, one from Dr. Stodden and one from Dr. Zgoba. Both can sit for a deposition on 1/9. Since Dr. Zgoba is on the East Coast, can we start her in the morning, at either 9 ET/6 PT or 10 ET/7 PT? Since Dr. Stodden is on the West Coast, can we start her in the afternoon, at either 3 ET/12 PT or 4 ET/1 PT?

Thanks,
Libby

Libby Marden

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F +1 312 862 2200

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From: Beth Wilkins <Wilkins@chaffinluhana.com>
Sent: Tuesday, December 30, 2025 3:09 PM
To: Marden, Libby <libby.marden@kirkland.com>
Cc: Caritis, Alexandra <alexandra.caritis@kirkland.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>; Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Bueno, Kim <kim.bueno@kirkland.com>; Levy, Jennifer <jlevy@kirkland.com>; Blake, Tara <tara.blake@kirkland.com>; #Uber KE – Paralegal Team <Uber_KE_Paralegal_Team@kirkland.com>
Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

This message is from an EXTERNAL SENDER

Be cautious, particularly with links and attachments.

Libby,

We plan to depose Uber's rebuttal expert on 1/9 by Zoom. Please let us know what time you'd like to get started on the 9th.

Thank you,

Beth

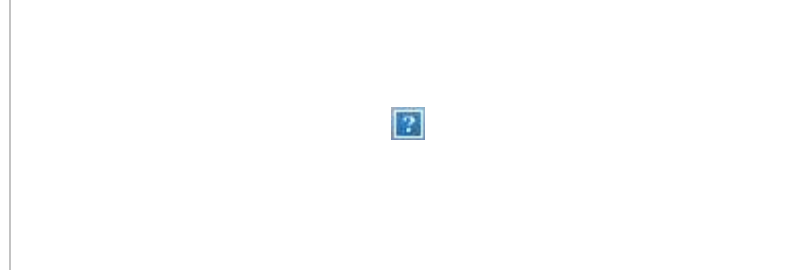
Beth Wilkins | Partner

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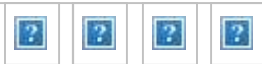
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From: Marden, Libby <libby.marden@kirkland.com>

Sent: Monday, December 22, 2025 2:12 PM

To: Beth Wilkins <Wilkins@chaffinluhana.com>

Cc: Caritis, Alexandra <alexandra.caritis@kirkland.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Uber MDL

Discovery Team <ubermddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>; Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Bueno, Kim <kim.bueno@kirkland.com>; Levy, Jennifer <jlevy@kirkland.com>; Blake, Tara <tara.blake@kirkland.com>; #Uber KE – Paralegal Team <Uber_KE_Paralegal_Team@kirkland.com>

Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Counsel,

Attached please find a deposition notice for Ms. Keller. As mentioned previously, we will need to have rebuttal reports due on 1/6 to incorporate this information and will offer our rebuttal expert(s), if any, for deposition between 1/7-1/9.

Thank you,
Libby

Libby Marden

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From: Marden, Libby

Sent: Saturday, December 20, 2025 10:22 AM

To: 'Beth Wilkins' <Wilkins@chaffinluhana.com>

Cc: Caritis, Alexandra <alexandra.caritis@kirkland.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>; Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Bueno, Kim <kim.bueno@kirkland.com>; Levy, Jennifer <jlevy@kirkland.com>; Blake, Tara <tara.blake@kirkland.com>

Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Beth,

We will issue a notice for Ms. Keller's deposition on 1/5. If Dr. Chandler is coming to trial, we want to depose him before he takes the stand. If you are not willing to tell us now, we will revisit this on 12/30 after receipt of your witness list.

Thanks,
Libby

Libby Marden

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From: Beth Wilkins <Wilkins@chaffinluhana.com>
Sent: Saturday, December 20, 2025 12:29 AM
To: Marden, Libby <libby.marden@kirkland.com>
Cc: Caritis, Alexandra <alexandra.caritis@kirkland.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>; Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Bueno, Kim <kim.bueno@kirkland.com>; Levy, Jennifer <jlevy@kirkland.com>; Blake, Tara <tara.blake@kirkland.com>
Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

We will hold 1/5 for Ms. Keller. Per the parties' agreement, the next updated witness list is to be exchanged on 12/30. Please let us know if you'd like to depose Dr. Chandler. He is unavailable the first two weeks of January and may now have a conflict on 12/31.

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Sent: Friday, December 19, 2025 9:20 AM

To: Beth Wilkins <Wilkins@chaffinluhana.com>

Cc: Caritis, Alexandra <alexandra.caritis@kirkland.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>; Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Marden, Libby <libby.marden@kirkland.com>; Bueno, Kim <kim.bueno@kirkland.com>; Levy, Jennifer <jlevy@kirkland.com>; Blake, Tara <tara.blake@kirkland.com>

Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Beth,

We only want to depose Dr. Chandler if he's going to be called at trial. If you don't know whether he will testify at this time, we will depose him once you make that decision. Regarding length of depositions, we will agree to three hours for Dr. Chandler's deposition (should you decide that he will be called to trial). We can tentatively agree to three hours for Keller, however, as you know, we had problems in Dr. Keller's prior deposition with her refusal to directly respond to questions and giving very lengthy answers to questions other than those that were asked. So while we are willing to try to complete the supplemental deposition in three hours, we reserve the right to seek additional time, including through court intervention, if we are unable to get direct answers to questions.

We can take Dr. Keller's deposition on 1/5 at 8 PT. We will need to have rebuttal reports due on 1/6 to incorporate this information and will offer our rebuttal expert(s), if any, for deposition between 1/7-1/9.

Thanks,
Libby

Libby Marden

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From: Beth Wilkins <Wilkins@chaffinluhana.com>
Sent: Wednesday, December 10, 2025 12:57 PM
To: Caritis, Alexandra <alexandra.caritis@kirkland.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>
Cc: Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Marden, Libby <libby.marden@kirkland.com>; Bueno, Kim <kim.bueno@kirkland.com>; Levy, Jennifer <jlevy@kirkland.com>
Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Alex,

Plaintiffs will comply with the schedule set by PTO 8 and expect both parties to strictly comply with the schedule laid out by paragraph 3, including an exchange of drafts by 3 pm PT on Friday and filing by 5 pm PT. We do not agree to more than 3 hours for Keller or Chandler. Keller is not available on 12/18 or 12/22. We will get back to you regarding your questions about Chandler.

Beth

Beth Wilkins | Partner

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From: Caritis, Alexandra <alexandra.caritis@kirkland.com>

Sent: Wednesday, December 10, 2025 10:51 AM

To: Beth Wilkins <Wilkins@chaffinluhana.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>

Cc: Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Marden, Libby <libby.marden@kirkland.com>; Bueno, Kim <kim.bueno@kirkland.com>; Levy, Jennifer <jlevy@kirkland.com>

Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Beth,

We will share our PTO8 sections on Monday and request your responses Thursday for filing Friday.

Concerning the depositions, we will agree to 3 hours for Chandler (pursuant to my note below) if you agree to 5 hours for Dr. Keller.

As to dates, is Dr. Keller available 12/18 or 12/22?

We see that Pl has identified Dr. Chandler as a "may call." Please provide us a date certain when you will know whether Chander will be called at the Dean trial and potential deposition dates 3-4 dates after that if he is coming to trial.

Thank you.

Alexandra Caritis

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From: Beth Wilkins <Wilkins@chaffinluhana.com>

Sent: Tuesday, December 9, 2025 12:01 PM

To: Caritis, Alexandra <alexandra.caritis@kirkland.com>; Roopal Luhana

<Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>

Cc: Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Marden, Libby <libby.marden@kirkland.com>

Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Alex,

The supplements to the Keller and Chandler reports all tie to Uber's withholding of and extremely delayed production of the Flack data. We do not agree to pull down any portion of either report. We will agree to a 3-hour deposition for each expert if Uber agrees to the same for Uber's rebuttal experts. Ms. Keller is available for her supplemental deposition on December 23 or January 5. We are working on dates for Dr. Chandler.

Beth

Beth Wilkins | Partner

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From: Caritis, Alexandra <alexandra.caritis@kirkland.com>

Sent: Tuesday, December 9, 2025 10:22 AM

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Cc: Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Marden, Libby <libby.marden@kirkland.com>

Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

All,

Following-up on the below. Can you please let us know your position and whether it would be helpful to discuss? If we are briefing this issue, we will need to do it soon.

Thanks.

Alexandra Caritis

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From: Caritis, Alexandra

Sent: Friday, December 5, 2025 4:01 PM

To: 'Beth Wilkins' <Wilkins@chaffinluhana.com>; 'Roopal Luhana' <Luhana@chaffinluhana.com>; 'Sarah London' <slondon@girardsharp.com>; 'Holly Dolejsi' <hdolejsi@anapolweiss.com>; 'Ellyn Hurd' <ehurd@simmonsfirm.com>; 'Andrew Kaufman' <akaufman@girardsharp.com>; 'Uber PW Bellwether' <uberbellwether@peifferwolf.com>; 'Steven Rotman' <srotman@hausfeld.com>; 'Rachel Abrams' <rabrams@peifferwolf.com>; 'Uber MDL Discovery Team' <ubermlddiscovery@chaffinluhana.com>; 'Sara Craig' <scraig@peifferwolf.com>

Cc: Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Marden, Libby <libby.marden@kirkland.com>

Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

All,

Thanks for the call earlier today. As we discussed, attached are annotated reports identifying the sections of the reports that do not relate to the October Flack productions and related deposition.

We look forward to hearing from you and are hopeful we can resolve this dispute without further

briefing. We're happy to get on another call to discuss.

Thanks.

Alexandra Caritis

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From: Caritis, Alexandra

Sent: Friday, December 5, 2025 10:36 AM

To: 'Beth Wilkins' <Wilkins@chaffinluhana.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>

Cc: Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Marden, Libby <libby.marden@kirkland.com>

Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Thanks, I'll send an invite.

Alexandra Caritis

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From: Beth Wilkins <Wilkins@chaffinluhana.com>

Sent: Friday, December 5, 2025 8:48 AM

To: Caritis, Alexandra <alexandra.caritis@kirkland.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>

Cc: Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Marden, Libby <libby.marden@kirkland.com>

Subject: RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Hi Alexandra. We can be available at 11 PT today.

Beth

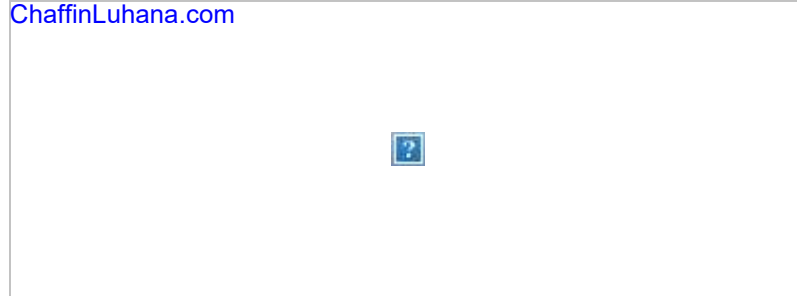
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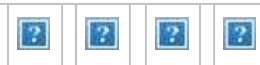
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Sent: Thursday, December 4, 2025 7:37 PM

To: Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellewether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Uber MDL Discovery Team <ubermddiscovery@chaffinluhana.com>; Sara Craig <scraig@peifferwolf.com>

Cc: Wyatt, Geoffrey M. <geoffrey.wyatt@kirkland.com>; Marden, Libby <libby.marden@kirkland.com>

Subject: FW: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

All,

We would like to meet and confer tomorrow morning concerning the Keller and Chandler reports served late Tuesday.

Please let us know your availability between 8-11PT.

Thanks.

Alexandra Caritis

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From: UberMDLService <UBERMDLSERVICE@LISTSERV.SHB.COM> **On Behalf Of** Tiffany R. Ellis

Sent: Wednesday, December 3, 2025 2:20 AM

To: UBERMDLSERVICE@LISTSERV.SHB.COM

Subject: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

EXTERNAL

Counsel:

At the following link you may download the updated report of Lacey Keller including all exhibits and/or attachments except those in the BDO environment.

[Keller 12.02.25 Supplemental Report \(link shared with Ds\)](#)

The password will follow under a separate cover.

If the report is marked confidential, we reserve the right to de-designate any of our expert reports that do not, in fact, contain such material, and will advise you of any such de-designation.

Tiffany R. Ellis

Partner



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